

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

IN RE GERBER PRODUCTS COMPANY	:	Master File No. 1:21-cv-0269
HEAVY METALS BABY FOOD	:	
LITIGATION	:	Class Action
	:	
THIS DOCUMENT RELATES TO:	:	Jury Trial Demanded
	:	
<i>Keeter v. Gerber Products</i>	:	Case No. 1:21-cv-0269
<i>Company</i>	:	
	:	
<i>Moore v. Gerber Products</i>	:	Case No. 1:21-cv-00277
<i>Company</i>	:	
	:	
<i>Hazely, et al. v. Gerber Products</i>	:	Case No. 1:21-cv-00321
<i>Company</i>	:	
	:	
<i>Bryan, et al. v. Gerber Products</i>	:	Case No. 1:21-cv-00349
<i>Company</i>	:	
	:	
<i>Adams v. Gerber Products</i>	:	Case No. 1: 21-cv-00410
<i>Company</i>	:	
	:	

**UNOPPOSED MOTION OF PLAINTIFFS TO CONSOLIDATE ACTIONS PURSUANT
TO FEDERAL RULE OF CIVIL PROCEDURE 42(a)(2)**

Plaintiffs in the five-above captioned actions, by their counsel, hereby move to consolidate each of these related actions.

Pursuant to Local Civil Rule 7(E), counsel for the parties' conferred regarding the substance of Plaintiffs' motion on May 19, 2021 and defense counsel represented that they do not oppose Plaintiffs' motion to consolidate these actions.

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Dated: May 20, 2021

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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic mail notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 20, 2021.

s/Francis J. Balint, Jr.

Francis J. Balint, Jr.